

EXHIBIT 6

Ryan Cordell

From: Louis F. Teran <lteran@slclg.com>
Sent: Monday, August 19, 2024 1:48 AM
To: Courtney Ervin; 'Cupar, David B.'
Cc: 'Cavanagh, Matthew J.'; Ryan Cordell; Felicia M. O'Loughlin
Subject: RE: Spectrum v. URZ - forensic collection

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Per my email below, please find below URZ's response to your request regarding the remaining computer and it emails.

First, regarding the computers. Your ESI vendor took two of URZ's computers to his lab for a full day of analysis. The two computers were a Dell Optiflex and a Dell Inspiron. You have represented that your ESI vendor was able to successfully retrieve data from the Dell Inspiron which served as URZ's server in which URZ's sales data was stored. You also represented that your ESI vendor was unable to retrieve any data from the Dell Optiflex and now needs the computer for an additional 7 days for further analysis. When these computers were given to your ESI vendor, the computers were not working but they were certainly NOT "fried" as you now indicate. As I indicated in my prior emails, the computers were not working but we were confident that the data could be retrieved with extra time and use of special tools. For this reason, we allowed your ESI vendor to take the computers for one full day. However, the computers were returned in what appears to be a much different condition than when it was given to your ESI vendor. It appears that the computers were taken apart by your ESI vendor as some of the screws appear to be loose. Even more, as you indicate in your email below, the computers are now "fried". More important, none of the data from the Dell Inspiron appear to be recoverable now as the computer appears to be fried. It seems that your ESI vendor retrieved the data from the Dell Inspiron and then fried the computer. URZ has not touched the Dell Optiflex because, per your email below, it is still at issue. But some of the screws appear to be loose, and the computer appears to have been taken apart. Therefore, before the Optiflex can be turned over to your ESI vendor again, we need to understand exactly what he has done to the computers and what he anticipates doing to the Optiflex computer for 7 days. By taking the computers apart, your ESI vendor has exceeded his authorization to merely image the data. It seems that his priority was to retrieve the data without regard for the preservation of the computer itself. This was not authorized. He was only allowed to image the files, not take the computer apart and fry it in the process. Please provide me with the requested information so that we can evaluate it and set limitations, if needed. More important, given that your ESI vendor was able to retrieve URZ's sales data from the Inspiron computer, please provide us with a copy thereof. As you can imagine, URZ is in dire need of said data and now your ESI vendor is the only one that has possession of this data. Please confirm that you will provide us with a copy of said data promptly.

Second, regarding the emails. I have been informed by URZ that its representatives provided your ESI vendor all passwords, codes, and any other credentials for the emails on August 8, 2024, while your ESI vendor was at URZ's facility. Even more, URZ has confirmed that its representatives ensured that your ESI vendor had access to URZ's emails while he was present at URZ's facilities on August 8, 2024. Therefore, by all indication, your ESI vendor had full unrestricted access to URZ's emails on August 8, 2024. Even more, per our emails prior to August 8, we had agreed and planned for all of the imaging of URZ's ESI assets to be completed on August 8, 2024. I had repeatedly indicated to you that your ESI vendor was welcome to stay at URZ's facility on August 8 as long as it needed to complete all of the imaging. There were never any time restrictions or other restrictions of any kind imposed on

your ESI vendor. URZ has also confirmed that when your ESI vendor left, he indicated that he had imaged everything he needed to image and that his job was complete. URZ's representative indicates that before your ESI vendor left URZ's facility, he asked your ESI vendor if he had finished everything and your ESI vendor responded in the affirmative. Therefore, by all indication, your ESI vendor imaged all of URZ's assets, including its emails, on August 8, 2024 as he was supposed to do. Now, I am confused as to why your ESI vendor needs to image URZ's emails for a second time at his office. Please provide the justification for a second imaging of URZ's emails outside the presence of URZ representatives.

In summary, before URZ can make a final decision on your requests, it needs the information requested above. Feel free to contact me with any comments or questions.

Thank you

Louis F. Teran
Attorney at Law
SLC Law Group
1055 E. Colorado Blvd., Suite #500
Pasadena, CA 91106
Phone: (818) 484-3217 x200
Fax: (866) 665-8877
<http://www.slclg.com>



***** WARNING: CONFIDENTIAL COMMUNICATION *****

This electronic message and any accompanying pages or attachments contain information from SLC Law Group. The information may be a confidential attorney-client communication containing information that is privileged or confidential. The information is intended to be for the use of the individual or entity named. Any dissemination, distribution or copying of this communication is strictly prohibited without our express permission. If you have received this communication in error, please notify us immediately by return e-mail or by calling us at (800) 752-8470. We will arrange the retrieval of the original documents at no cost to you. Thank you.

From: Louis F. Teran <lteran@slclg.com>
Sent: Wednesday, August 14, 2024 1:15 PM
To: 'Courtney Ervin' <cervin@hicks-thomas.com>; 'Cupar, David B.' <dcupar@mcdonaldhopkins.com>
Cc: 'Cavanagh, Matthew J.' <mcavanagh@mcdonaldhopkins.com>; 'Ryan Cordell' <rcordell@hicks-thomas.com>; 'Felicia M. O'Loughlin' <foloughlin@hicks-thomas.com>
Subject: RE: Spectrum v. URZ - forensic collection

I have a meeting with URZ scheduled for Friday to discuss this matter. I will provide you URZ's response on this matter soon thereafter. Feel free to contact me with any comments or questions.

Thank you

Louis F. Teran
Attorney at Law
SLC Law Group
1055 E. Colorado Blvd., Suite #500
Pasadena, CA 91106
Phone: (818) 484-3217 x200
Fax: (866) 665-8877

<http://www.slclg.com>



***** WARNING: CONFIDENTIAL COMMUNICATION *****

This electronic message and any accompanying pages or attachments contain information from SLC Law Group. The information may be a confidential attorney-client communication containing information that is privileged or confidential. The information is intended to be for the use of the individual or entity named. Any dissemination, distribution or copying of this communication is strictly prohibited without our express permission. If you have received this communication in error, please notify us immediately by return e-mail or by calling us at (800) 752-8470. We will arrange the retrieval of the original documents at no cost to you. Thank you.

From: Courtney Ervin <cervin@hicks-thomas.com>

Sent: Wednesday, August 14, 2024 10:50 AM

To: Louis F. Teran <Iteran@slclg.com>; 'Cupar, David B.' <dcupar@mcdonaldhopkins.com>

Cc: 'Cavanagh, Matthew J.' <mcavanagh@mcdonaldhopkins.com>; Ryan Cordell <rcordell@hicks-thomas.com>; Felicia M. O'Loughlin <foloughlin@hicks-thomas.com>

Subject: RE: Spectrum v. URZ - forensic collection

Mr. Hughes is doing the email collection at his office with his equipment, not at URZ's office. All that has ever been required for this collection is a brief phone call with the owner of the email account and Mr. Hughes. Spectrum first requested this phone call to take place six weeks ago. There is no excuse for this collection (and analysis) not to have already been completed. As for why it has not happened yet, as stated below (and as URZ would know), access to the email accounts requires 2-step verification—i.e. the password and the verification code. Thus, the URZ person receiving the verification code must provide it to Mr. Hughes for him to conduct the collection. Mr. Hughes has therefore still been denied access to the email accounts for the collection—a violation of the Court's order.

The computer at issue is Dell Optiplex 3010. I'm not a forensic expert and cannot explain the ins and outs of why the analysis of the damaged computer will take approximately 7 days except as I already explained below. In short, the computer is fried and it will take days for Mr. Hughes to run the processes he can to see if he can get the computer to power up and then, if the computer will power up, to see what, if any, information can be retrieved. There is no reason for why URZ denied Mr. Hughes the ability to keep the computer – which does not work and thus is not being used by URZ – at the time of the initial collection. That was the evening of August 8. This process would have been completed around tomorrow but for URZ's refusal to allow Mr. Hughes to keep the computer until he could complete his efforts. This too is a violation of the Court's order. Please provide a time on August 19 for Mr. Hughes to send a courier to retrieve the computer.

Mr. Hughes requires at least 24 hours' notice to schedule any collection – this applies to the emails and retrieving the Dell Optiplex computer. Accordingly, I need your prompt response regarding collection of one of the email accounts tomorrow.

From: Louis F. Teran <Iteran@slclg.com>

Sent: Wednesday, August 14, 2024 11:23 AM

To: 'Cupar, David B.' <dcupar@mcdonaldhopkins.com>; Courtney Ervin <cervin@hicks-thomas.com>

Cc: 'Cavanagh, Matthew J.' <mcavanagh@mcdonaldhopkins.com>; Ryan Cordell <rcordell@hicks-thomas.com>; Felicia M. O'Loughlin <foloughlin@hicks-thomas.com>

Subject: RE: Spectrum v. URZ - forensic collection

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I first need a response to my email below before this can be considered.

Thank you

Louis F. Teran
Attorney at Law
SLC Law Group
1055 E. Colorado Blvd., Suite #500
Pasadena, CA 91106
Phone: (818) 484-3217 x200
Fax: (866) 665-8877
<http://www.slclg.com>



***** WARNING: CONFIDENTIAL COMMUNICATION *****

This electronic message and any accompanying pages or attachments contain information from SLC Law Group. The information may be a confidential attorney-client communication containing information that is privileged or confidential. The information is intended to be for the use of the individual or entity named. Any dissemination, distribution or copying of this communication is strictly prohibited without our express permission. If you have received this communication in error, please notify us immediately by return e-mail or by calling us at (800) 752-8470. We will arrange the retrieval of the original documents at no cost to you. Thank you.

From: Cupar, David B. <dcupar@mcdonaldhopkins.com>
Sent: Wednesday, August 14, 2024 9:13 AM
To: 'Louis F. Teran' <lteran@slclg.com>; 'Courtney Ervin' <cervin@hicks-thomas.com>
Cc: Cavanagh, Matthew J. <mcavanagh@mcdonaldhopkins.com>; 'Ryan Cordell' <rcordell@hicks-thomas.com>; 'Felicia M. O'Loughlin' <foloughlin@hicks-thomas.com>
Subject: RE: Spectrum v. URZ - forensic collection

Louis,

Based on: (1) all of these continued problems from URZ, (2) the fact that it has strained Spectrum's ability to obtain ESI from URZ despite the Court's deadline that URZ was supposed to have completed this weeks ago, and (3) the fact that Spectrum has not obtained the necessary ESI let alone had a chance to review it, let me know if URZ will agree to withdraw its motion for leave to file a summary judgment motion.

Best,
Dave

David B. Cupar
Member

T: 216.430.2036
F: 216.348.5474
dcupar@mcdonaldhopkins.com
www.mcdonaldhopkins.com

600 Superior Avenue East
Suite 2100
Cleveland, OH 44114

McDonald
Hopkins
A business advisory and advocacy law firm®

From: Louis F. Teran <Iteran@slclg.com>
Sent: Wednesday, August 14, 2024 12:06 PM
To: 'Courtney Ervin' <cervin@hicks-thomas.com>
Cc: Cavanagh, Matthew J. <mcavanagh@mcdonaldhopkins.com>; Cupar, David B. <dcupar@mcdonaldhopkins.com>; 'Ryan Cordell' <rcordell@hicks-thomas.com>; 'Felicia M. O'Loughlin' <foloughlin@hicks-thomas.com>
Subject: [External] RE: Spectrum v. URZ - forensic collection

I have not been able to discuss the email below with URZ yet. However, I have some questions. It is my understanding that your ESI vendor was given access to the emails on August 8 and that your ESI vendor was at URZ's facility until around midnight on August 8 imaging everything. Why does he need access to the emails again?

Secondly, you still have not informed us as to which of the 2 damaged computers were imaged and which has not been. I also need more details as to why it will take 7 days and why it is not certain that the data can be retrieved. As you can imagine, URZ is in dire need of the data for its own business needs. So I need to know why your expert cannot guarantee that the data will be retrieved. Otherwise, URZ may want to consult its own experts to properly retrieve the data.

Please let me know the above. In the meantime, I will try to meet with URZ on this matter either today or tomorrow.

Thank you

Louis F. Teran
Attorney at Law
SLC Law Group
1055 E. Colorado Blvd., Suite #500
Pasadena, CA 91106
Phone: (818) 484-3217 x200
Fax: (866) 665-8877
<http://www.slclg.com>



***** WARNING: CONFIDENTIAL COMMUNICATION *****

This electronic message and any accompanying pages or attachments contain information from SLC Law Group. The information may be a confidential attorney-client communication containing information that is privileged or confidential. The information is intended to be for the use of the individual or entity named. Any dissemination, distribution or copying of this communication is strictly prohibited without our express permission. If you have received this communication in error, please notify us immediately by return e-mail or by calling us at (800) 752-8470. We will arrange the retrieval of the original documents at no cost to you. Thank you.

From: Courtney Ervin <cervin@hicks-thomas.com>
Sent: Tuesday, August 13, 2024 2:39 PM
To: Iteran@slclg.com
Cc: Cavanagh, Matthew J. <mcavanagh@mcdonaldhopkins.com>; Cupar, David B. <dcupar@mcdonaldhopkins.com>; Ryan Cordell <rcordell@hicks-thomas.com>; Felicia M. O'Loughlin <foloughlin@hicks-thomas.com>
Subject: Spectrum v. URZ - forensic collection

Louis:

The following matters remain outstanding regarding the collection of ESI per the Court's July 5 order.

First, URZ's email accounts could not be accessed because two-step verification is turned on. Thus, for Mr. Hughes to collect these accounts, URZ and Mr. Hughes must coordinate his accessing these accounts. URZ has represented that there are two email accounts. Mr. Hughes must access and collect them one at a time. Accordingly, please provide a specific date and time for the collection of the first account on Thursday, August 15 and a specific date and time for the collection of the second account on Friday, August 16. Mr. Hughes and the person receiving the verification code will need to be on a brief telephone call together until Mr. Hughes is able to access each account.

Second, with regard to the computer that Mr. Hughes was unable to access during the time allotted by URZ, Mr. Hughes estimates that he needs up to 7 days to complete this collection (assuming the data can be accessed). To this end, please provide a time on August 19 for Mr. Hughes to send a courier to collect the computer from URZ for the ESI collection to take place. As Spectrum has previously stated, Mr. Hughes will conduct the collection as reasonably quickly as possible, but because the computer has been damaged, the time for the collection is estimated to take up to 7 days. (It could be longer, but this is not anticipated). Spectrum will keep you apprised of the estimated time for collection. If URZ refuses to provide the computer as indicated herein, let me know today and Spectrum will seek relief from the Court.

URZ is in violation of the Court's order with regard to both of these matters. Spectrum continues to reserve all of its rights with regards to URZ's ongoing failure to Court's order.

Best regards,

Courtney



Courtney Ervin
Partner
713-547-9163 office
713-547-9150 fax
cervin@hicks-thomas.com
www.hicks-thomas.com
[Bio](#) | [vCard](#)

Notice: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. *Nothing contained in this message or in any attachment shall constitute a contract or electronic signature under the Electronic Signatures in Global and National Commerce Act, any version of the Uniform Electronic Transactions Act or any other statute governing electronic transactions, unless specifically stated above.*